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March 7, 2014

Via Electronic Comment Filing System

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 10-90 – Expression of Interest in Conducting Rural Broadband Experiment

Dear Ms. Dortch:

Enclosed for electronic filing via the Electronic Comment Filing System ("ECFS") in compliance with Federal Communications ("FCC") Order, FCC 14-5, is the attached non-binding Expression of Interest ("EOI") for Premier Communications, Inc., ("Premier") regarding the Connect America Phase II network experiments. Premier appreciates the opportunity to file the non-binding EOI.

If you have any questions or concerns on the attached EOI, please contact me.

Respectfully Submitted,

/s/ Douglas A. Boone

Douglas A. Boone
Chief Executive Officer
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Attachments (Non-binding EOI)

Non-Binding Expression of Interest – Phase II Rural Broadband Experiment

Premier Communications, Inc., (“Premier”) submits this Expression of Interest (“EOI”) for Connect America Phase II Rural Broadband Experiments per Federal Communications Commission (“FCC”) Order, FCC 14-5. This is Stage 1 of the FCC’s Phase II experiment proposals and Premier anxiously awaits release of the Stage 2 formal proposal requirements.

Background

Premier is a stand-alone Competitive Local Exchange Carrier (“CLEC”) whose parent company has been in existence for over 100 years. Over the last 10 years Premier has transformed itself, through acquisitions and infrastructure deployment, into a full-service communications provider offering high-speed Internet (wired & wireless), voice and video services in northwest Iowa. Specifically, in the last five years, Premier’s management team (through its parent company and subsidiaries) has successfully overseen over 350 miles of fiber deployment, which was all designed for Fiber to the Premise (“FTTP”).

As a CLEC, Premier has Eligible Telecommunication Carrier (“ETC”) status in its current serving territories and is very familiar with the process of amending its ETC designation in the state of Iowa if its application is approved and amendments are required. Premier does not currently receive Universal Service Funding; however, other companies within Premier’s operating group receive Universal Service Funding and have extensive experience with the associated regulatory requirements.

Premier feels very strongly their investment in broadband infrastructure has not only given its residential customers opportunities for e-learning, e-health, smart home & farm technologies; but it has also given those areas opportunities for economic development and job growth that would not have been possible without it. Through this expression of interest, Premier seeks to provide these same opportunities to areas outside of its service territory which currently lack adequate broadband capabilities.

Proposed Service Area

The proposed service area covers the following census tract numbers: **19059450200, 19059450500, 19059450800, 19059451000, 19059451100, 19119950100, 19119950200, 19119950300, 19149970100, 19149970200, 19149970300, 19149970400, 19149970500, 19149970600, 19167070100, 19167070200, 19167070300, 19167070400, 19167070500, 19167070600 and 19167070700.**

The project would seek to serve those unserved census blocks within the census tracts listed above which include households in Lyon, Plymouth, Sioux and Dickinson counties in Iowa. Premier currently has a mixture of fiber, coax and fixed wireless infrastructure in its Iowa exchanges and would be looking to expand its FTTP and fixed wireless footprint to the census tracts referenced above.

Broadband Technology

In order to utilize CAF support effectively, Premier will consider using a hybrid fixed wireless and Fiber to the Premises (“FTTP”) with a Gigabit Passive Optical Network (“GPON”) architecture for this proposed project area in order to build a robust and scalable high-speed broadband network. A hybrid solution would allow Premier to utilize its AWS spectrum, existing tower assets, and fiber transport network already in place. In areas where economically feasible, including all Community Anchor Institutions (“CAIs”), a FTTP network will be built in addition to building fiber to all tower locations utilizing Premier’s fixed wireless solution. Both the FTTP and fixed wireless network architectures would provide an economical, robust broadband networking solution with the flexibility to meet the customer demand for two-way, interactive multimedia-based services.

Service Offerings

Premier would provide the full suite of communications services including: voice service, high-speed broadband service, and Internet Protocol (IP) video service (where possible). Premier would expect to provide flexible speed tiers up to 1 Gbps for all the business and community anchor institutions in the proposed serving area. Residential options would vary depending on whether the customer is served by FTTP or fixed wireless, but tiers up to 100 Mbps would be offered in the proposed serving area, where possible.

Funding

Under the Rural CAF Experiment program, we are excited to express our continued interest in serving rural northwest Iowa. With that, the size of the project depends substantially on the location of the specific census blocks eligible for support and the amount of support ultimately available. Premier is ready to start this project once selected and funding is secured. The funding under the Rural CAF Experiment program would help offset the upfront capital investment and allow Premier to build an efficient, state-of-the-art hybrid wireless and FTTP network, which will ensure that all rural residents in the proposed area will have access to the vital communications services they need to prosper in this digital age.

Conclusion

Premier appreciates the opportunity that the FCC is providing by allowing rural local exchange carriers to submit an Expression of Interest for the Rural CAF Experiment. As stated above, Premier is considering a hybrid wireless and FTTP network build within northwestern Iowa if the funding would be made available. The hybrid wireless and fiber network would provide the residents, business and CAI’s with a robust and scalable high-speed broadband network.

Premier is a very strong, healthy, dedicated and committed rural telecommunications provider. The staff is extremely knowledgeable and holds the wherewithal to complete the FTTP / fixed wireless overbuild and to see it to full fruition while delivering advanced services to each person who lives and works within the proposed service area.